

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268

Postal Regulatory Commission
Office of the Chief Admin. Officer

NOV 18 2011

2011 NOV 18 P 2:38

In the Matter of:

Ardenvoir, WA, 98811 POSTAL REGULATORY COMMISSION
Post Office State ZIP Code Docket No: A2012-11

Christine Malkin Petitioner(s)
et al

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the ARDENVOIR post office. The Final Determination was posted Sept 10, 2011 (date) (→ Oct 10 2011) ROUND STAMPS

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

We believe the Commission should reverse
the final determination and return the matter
of closing Ardenvoir Post Office to USPS for
further consideration (See attached two [2] [27]
pages of reasons with ^{five} supporting Appendices).

Participant Statement: Form 61 Docket A2012-11
Christine Mallon

We believe the Commission should reverse the final determination and return the matter of closing the Ardenvoir Post Office for further consideration.

1. The postal service is required to consider the effect of closing Ardenvoir PO on the community served. Both times Marv Hertzberg has responded to my written comments (appendices A & B), a blanket statement has been used that the proposed alternate delivery service (rural carrier) will provide "maximum degrees of effective and regular service". Specific concerns were never addressed:

- a) there are a minimum of five box holders who by reason of age (91, 90, 89, 84) or disability [and they live independently yet] should not be defaulted to rural carrier delivery as digging an annual average of 36" of snow from a roadside mail receptacle, vs having a secure post office box, is not effective service from their point of view. They can drive at their convenience 1-3 miles to Ardenvoir PO vs 16 miles downstream to Entiat PO.
- b) There are a minimum of four boxholders who live one or three miles from the rural delivery route. Effective service means secure service to us. A mailbox remotely located is subject to theft. We have safety & security in Ardenvoir PO at \$45 annually... you are asking us to purchase an \$800 locking receptacle (CBU) to secure our rural delivery if you close the Post Office (Appendices A & C). We have had our PO Box 35 years; our neighbors have had theirs over 65 years.
- c) The historic value of the Ardenvoir Post Office's existence since 1931 was never addressed.

2. Following procedure:

- a) The final determination posted did not clearly include/post an invitation for comments with a round date (section 3001.117).

3. Factual data is errant or insufficient to prove what the Postal Service says they prove:

- a) The last postmaster at Ardenvoir retired September 30, 2008 (not October 2, 2009). I asked her. You can check your retirement payment records. The effective date was errantly listed as October 2, 2009. (Appendices C & D)

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Mallon

- b) It is also stated that since her (PM) retirement, an OIC has been installed. That is incorrect. The operating personnel have been PMR (Appendix D).
- c) The errors in the year of retirement and the pay-scale of the replacement for three years therefore compromises the Section IV Economic Savings breakdown for wages...too high...and thus reduces the savings claimed by the Postal Service Appendices C & D).
- d) The Post Office doesn't say what increased cost will occur as a result of the rural carrier potentially adding mileage and time to his route in a re-bid: adding Mad River; Mill Camp; Mud Creek; and door-delivery for handicapped.
- e) Where was the income shown for rent the 60 box holders pay, offsetting some expenses? Window hours were reduced over a year ago, saving further expenses not accounted for.
- f) Who did the community survey (Appendix E, section II)? The information misrepresents by an implication of a majority of "vacation homes...[residents] work in nearby community at local businesses." Some postal official needs to be accompanied by a local resident to identify, on a drive from 2 miles below Ardenvoir to milepost 24 in our dead-end valley to identify the majority number of residents vs the minority who are vacation home owners. Also realize the "nearbycommunities/businesses" are Wenatchee and Chelan...fully 30 miles either direction from Ardenvoir PO.
- g) Cost effectiveness is not clearly demonstrated; unsubstantiated for the conclusion in Section VI Summary ("the advantages outweigh the disadvantages and this final determination is warranted" (Appendix C).

Respectfully requesting that the Postal Service start over in its assessment by using correct facts and figures and hardships and community/history to compare advantages and disadvantages...without a predetermined course of action (ie closing Ardenvoir PO).

Postal Customer Questionnaire

1. Please check the appropriate box to indicate which post office you use for each of the following:

Postal Services	Daily	Weekly	Monthly	Never	Miles one way
a. Buy stamps at: _____	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
b. Mail letters at: _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
c. Mail parcels at: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4
d. Pick up Post Office Box mail at: _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
e. Picking up general delivery mail: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1
f. Buying money orders: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g. Special services, including Certified mail, Registered mail, Insured mail, Delivery Confirmation, or Signature Confirmation:					
at: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4
h. Sending Express Mail: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
i. Buying stamp-collecting material _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Additional Comments: _____

2. What Post Office(s) do you pass during business hours while traveling to or from work, or shopping, or for personal needs?

Name of Post Office: East Wenatchee 98802 Miles one way: 35 Comment: 3 months of the year I do not use this P.O. while I am working, during the school year, it is okay... but not in summer.

Name of Post Office: _____ Miles one way: _____ Comment: _____

3. There may be a change to your delivery service or to your mailing address or ZIP Code. We are studying the possibility of closing the Ardenvoir Post Office. In order to complete our study your response will help determine the best course of action.

Your additional comments: UPS nor FedEx deliver up our rural road
11515 Mud Creek Rd, 3 1/2 miles from rural deliver,

We have had the same box for 35 years. Our neighbors for 65 years. The post office is historic, from the 1930 Ardenvoir mill town. There are many of us who cannot easily manage trips to Entiat PO 16 miles away, with current gas costs.

Name: (Michael and) Christine Mallon (Please print your name)
 Address: PO Box 261 Ardenvoir WA 98811 safe on the rural delivery route 3 1/2 miles from our house.
 Telephone number: 509 784 1860 Date: 4/27/11

Thank you for taking the time to complete this questionnaire. Your response and comments will become part of the official record on this subject. Please return this questionnaire by May 9, 2011. If you wish, you may hand your completed survey to a clerk at this postal unit.

Appendix
B



10/29/2011

CHRISTINE MALLON
P.O. BOX 261
ARDENVOIR WA 98811

Dear Postal Service Customer:

Thank you for taking the time to submit your comments to the proposal to close the Ardenvoir Post Office. Your comments are appreciated and will be carefully considered, along with the comments of other customers, as the matter is reviewed further in my office and at higher levels of the Postal Service.

In response to your letter:

- You expressed a concern that the Postal Service exhibits a lack of interest in the mailing needs of the community. The Postal Service is required to provide each community with regular and effective service, using the most cost efficient means possible. The proposed alternate delivery service will meet the mailing and service needs of the community in a more cost effective manner.

I realize with change there is always concern. However we are confident that the alternate service listed in the proposal will continue to provide you with effective and regular service.

If you have additional questions or comments, please feel free to contact Doreen Karoly at (206) 442-6171.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hertzberg".

Marv Hertzberg
Manager, Post Office Operations
415 First Ave N
Seattle, WA, 98109-9998

App C *

VI. SUMMARY

This is the final determination to close the Ardenvoir, WA Post Office and provide delivery and retail services by highway contract route service under the administrative responsibility of the Entiat Post Office, located 12 miles away. Service will be provided to cluster box units (CBUs).

The postmaster retired on October 02, 2009. If the office has a noncareer PMR(s), they may be separated from the Postal Service however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. The workload has declined. Effective and regular service will continue to be provided by highway contract route service.

The Ardenvoir Post Office provided delivery and retail service to 63 PO Box or general delivery customers and no delivery route customers. The daily retail window transactions averaged 14. There are no permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$42,159 annually. A disadvantage to some will be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

rural
carrier
must
re-bid

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

VII. NOTICES

- A. Support Materials. Copies of all materials upon which this final determination is based are available for public inspection at the Ardenvoir Post Office and Entiat Post Office during normal office hours.
- B. Appeal Rights. This final determination to close the Ardenvoir Post Office may be appealed by any person served by that office to the Postal Regulatory Commission at 901 New York Ave NW, Suite 200, Washington DC 20268-0001. Appeals must be received by the Commission within 30 days of the date this final determination is posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission or the parties to the appeal will be made available for public inspection at Ardenvoir Post Office and Entiat Post Office during normal office hours.



Dean J Granholm
Vice President of Delivery and Post Office Operations

09/07/2011

Date

Response:

Businesses generally require regular and effective postal services, and these will always be provided to the community. Since the suspension of service, there has been no indication that the business community has been adversely affected. Questionnaire responses revealed that customers will continue to use local businesses if the Post Office is discontinued.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this final determination will not adversely affect the community.

III. EFFECT ON EMPLOYEES

The postmaster position became vacant when the postmaster retired on ~~October 02, 2009~~ Sept. 30, 2008. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected. Since the postmaster vacancy an PMR has been installed to operate the office.

IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of \$ 42,159 with a breakdown as follows:

Postmaster Salary (EAS-11, No COLA)
Fringe Benefits @ 33.5%
Annual Lease Costs

Total Annual Costs
Less Annual Cost of Replacement Service

Total Annual Savings

~~\$ 33,168~~
~~\$ 11,111~~
+ \$ 1,380

error

~~\$ 45,659~~
- \$ 3,500

WRONG

\$ 42,159

INTEREST!

A one-time expense of \$ 3000 will be incurred for the movement of this facility.

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

no cable
dsl in valley
for internet
printing of postal
labels.

from 5/21/11 proposal

★
Appendix
E

Some advantages of the proposal are:

1. The rural or contract delivery carrier may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. *where?* CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier. *no - Ardenvoir is not convenient by*
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

Taking all available information into consideration, the Postal Service concludes this proposal will provide a maximum degree of effective and regular postal services to the community

II. EFFECT ON COMMUNITY

there
Ardenvoir is an unincorporated community located in CHELAN County. The community is administered politically by Not Incorporated No Local Government. Police protection is provided by the County Deputy. Fire protection is provided by the Forest Service or Fire District. The community is comprised of Vacation homes in forest setting. Some residents are year round and tele-commute, and those who commute to work at nearby communities and work in local businesses.

Businesses and organizations include Post Office is in a corner of a store and restaurant building which is the only business in this community. There is a summer use only church camp up river. Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Ardenvoir Post Office will be available at the Entiat Post Office. Government forms normally provided by the Post Office will also be available at the Entiat Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed on the returned questionnaires at the community meeting, on the petition, and on the congressional inquiry

None

Based on the information obtained in the course of this discontinuance study the Postal Service concludes this proposal will not adversely affect the community

first
try
was
returned!
did you
try hard?



EG 920550987 US

Guaranteed Delivery
Insured, Signed
First-Class® Registered Mail®

NO DELIVERY
Workday Delivery
I warrant that this is the true and correct name of the addressee of this mail piece. I wish delivery to be made without obtaining signature of addressee or addressee's agent if delivery employee judges that such is in his or her best interest. I understand that delivery employee's signature constitutes your proof of delivery.

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